

# EXHIBIT F

## JONES DAY

500 GRANT STREET, SUITE 4500 • PITTSBURGH, PENNSYLVANIA 15219.2514

TELEPHONE: +1.412.391.3939 • FACSIMILE: +1.412.394.7959

DIRECT NUMBER: (412) 394-7929  
LEELLSWORTH@JONESDAY.COM

JP096377 / #1283665  
149637-635001

April 15, 2014

### VIA E-MAIL

Colin Callahan, Esq.  
Assistant United States Attorney  
Western District of Pennsylvania  
U.S. Post Office & Courthouse  
700 Grant Street, Suite 4000  
Pittsburgh, PA 15219

Re: *U.S. ex rel. Washington v. Education Management Corporation, et al.* (No. 07-461)

Dear Colin:

I write in response to your letter of April 10, 2014 concerning Defendants' production of information related to their salary reviews. Your letter appears to reflect Plaintiffs' failure to review either the documents we have produced to date or the cover letters and attached exhibits that accompanied each production.

Salary review information has been produced by Defendants on multiple occasions throughout the course of discovery beginning with Defendants' first production on October 15, 2013. You are now aware that Defendants' expert, Dr. Lazear, has created a database; Plaintiffs may seek that information through the appropriate procedural mechanisms.

As the government is aware, the redacted Salary Worksheets attached to your letter were provided by Defendants pre-intervention. Employee names were appropriately redacted because no protective order was in place at that time. Unredacted copies of the Salary Worksheets were produced to Plaintiffs (in certain cases multiple times) as early as October 2013, complete with metadata that enables you to confirm, if you so choose, that complete copies of all of these documents have been in your possession for months. Moreover, Defendants produced information from the Lawson database in October for every individual subject to a salary review.

Finally, you are incorrect in your assertion that little, if any, material has been produced by Defendants regarding compensation at schools not on the matrix plan. Defendants have produced both pre- and post-plan materials at multiple schools and we refer you to our detailed production letters to identify those documents. We do not believe it is appropriate for you to ask us to itemize documents than we have already identified in our production letters with more precision that the government has been willing to provide reciprocally.

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Very truly yours,

/s/ Laura E. Ellsworth

Laura E. Ellsworth